

1 William S. Koski (SBN 166061)
2 Carly J. Munson (SBN 254598)
MILLS LEGAL CLINIC
STANFORD LAW SCHOOL
YOUTH & EDUCATION LAW PROJECT
3 559 Nathan Abbott Way
Stanford, California 94305-8610
4 Tel: (650) 724-3718
Fax: (650) 723-4426
Email: bkoski@stanford.edu
Email: cmunson@law.stanford.edu
6 *Attorneys for Plaintiffs*

7 KAMALA D. HARRIS
8 Attorney General of California
9 LISA A. TILLMAN, DEPUTY (SBN 126424)
Deputy Attorney General
10 1300 I. Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Tel: (916) 327-7872
Fax: (916) 324-5567
Email: Lisa.Tillman@doj.ca.gov
*Attorneys for Defendants Delaine Eastin,
Superintendent of Public Instruction, and
Department of Education*

11 Arlene B. Mayerson (SBN 79310)
Larisa Cummings (SBN 131076)
DISABILITY RIGHTS EDUCATION AND
DEFENSE FUND, INC.
12 3075 Adeline Street, Suite 210
Berkeley, California 94703
Tel: (510) 644-2555
Fax: (510) 841-8645
Email: lcummings@dredf.org
13 *Attorneys for Plaintiffs*

14 JOHN C. BEIERS
COUNTY COUNSEL
KATHRYN E. MEOLA, DEPUTY (SBN 172034)
AIMEE B. ARMSBY, DEPUTY (SBN 226967)
Hall of Justice & Records
400 County Center, 6th Floor
Redwood City, CA 94063
Tel: (650) 363-4647
Fax: (650) 363-4034
Email: kmeola@co.sanmateo.ca.us
Email: aarmsby@co.sanmateo.ca.us
15 *Attorneys for Defendant Ravenswood City
School District*

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 EMMA C., et al.,

Case No.: C-96-4179 (TEH)

19 Plaintiffs,

**JOINT STIPULATION and [PROPOSED]
ORDER RE: ASPIRE PUBLIC SCHOOLS**

20 v.
21 DELAINE EASTIN, et al.,

Hearing Date: August 30, 2011

Time: 2:00 p.m.

Courtroom: Hon. Thelton E. Henderson

22
23 Defendants.
24

JOINT STIPULATION

In response to this Court’s July 25, 2011, order, the Parties submit this joint stipulation regarding the provision of special education services to students at the East Palo Alto Charter School (“EPACS”), which is operated by Aspire Public Schools, Inc. (“Aspire”). (Court Docket 1639.)

The parties and counsel for Aspire have conferred about this matter and have agreed that the Ravenswood City School District (“Ravenswood”) will continue to provide special education services to students at EPACS for the 2011-2012 school year. Attached as Exhibit A is a letter from Aspire’s counsel reflecting this agreement. Accordingly, EPACS’s special education service delivery will remain subject to this Court’s jurisdiction and ongoing monitoring pursuant to the First Amended Consent Decree and Ravenswood Self Improvement Plan.

If the parties and Aspire come to an alternate agreement regarding these issues in the future, the parties will take appropriate steps to inform and seek the guidance of this Court.

Given this agreement, the parties respectfully request that this Court vacate the briefing and hearing schedule set forth in its July 25, 2011, order.

Dated: August 10, 2011 YOUTH AND EDUCATION LAW PROJECT

By: _____ /s/
William S. Koski
Attorneys for Plaintiffs

COUNTY COUNSEL OF THE COUNTY OF SAN MATEO

By: _____ /s/
Aimee B. Armsby
Attorneys for Defendant Ravenswood City School District

OFFICE OF THE CALIFORNIA ATTORNEY GENERAL

By: _____ /s/
Lisa A. Tillman
*Attorneys for Defendants Delaine Eastin, Superintendent of
Public Instruction, and Department of Education*

1 **[PROPOSED] ORDER**

2 The Court has reviewed the parties' joint stipulation regarding the provision of special
3 education services to students at EPACS during the 2011-2012 school year, submitted in
4 accordance with this Court's July 25, 2011, order.

5 For good cause shown, the parties' request to vacate the August 30, 2011, hearing and
6 corresponding briefing schedule is granted.

7 IT IS SO ORDERED.

8 Dated: 08/16/2011

